South Coast
Air Quality Management District
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FAXED: APRIL 13, 2007

April 13, 2007

Mr. Paul Toomey
City of Yucaipa
Planning Division
34272 Yucaipa Boulevard
Yucaipa, CA 92399

Dear Mr. Toomey:

Draft Environmental Impact Report (DEIR) for Oak Hills Marketplace
Yucaipa: February 2007

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Environmental Impact Report.

SCAQMD staff is concerned that the air quality analysis is incomplete. Specifically, the lead agency has not analyzed the exhaust emissions from the trucks that will be transporting several thousand cubic yards of soil to and from the project site during site grading.

Attached, please find detailed comments on the DEIR. Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Environmental Impact Report. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Charles Blankson, Ph.D., Air Quality Specialist – CEQA Section, at (909) 396-3304 if you have any questions regarding these comments.

Sincerely

Susan Nakamura
Planning & Rules Manager
Planning, Rule Development & Area Sources

Attachment
SS: CB

SBC070228-01
Control Number

Draft Environmental Impact Report for the
Oak Hills Marketplace: Yucaipa
(February 2007)

1. Cancer Risks

Please note that SCAQMD Rules 201 and 203 require that gas/service stations apply for a permit to construct and operate. SCAQMD Rule 1401 – New Source Review of Toxic Air Contaminants, also requires the health risk from the gas station to not exceed 10 in one million if the gas station includes T-BACT.

2. Project Description and URBEMIS Input/Output Data

On page 2-3 of the DEIR, the proposed project is described as occupying 613,304 square feet of building space on approximately 63.66 acres. The 63.66 acres comprise 61.33 acres of buildable land and 2.34 acres of right-of-way. The lead agency used 80 acres, however, to represent the total project acreage in the URBEMIS model run. Please address this discrepancy in the Final EIR.

3. Construction Truck Emissions:

In Section 4.15 – Transportation, Circulation and Parking, the lead agency indicates that project construction will require the import of 638,292 cubic yards of soil from off site and the export of 65,390 cubic yards of soil. The lead agency does not quantify these truck trips nor their impacts on air quality. The air quality analysis is incomplete without quantification of the emissions from these truck trips.

Please provide data on the number of trucks that would be involved in hauling the soil both to and from the project site, the distances to be covered by these trucks, emission factors as well as the truck emissions in the Final EIR.

4. Diesel Truck Emissions and Health Risks:

The lead agency estimates on page 4.15-6, in section on Transportation, Circulation and Parking, of the DEIR that the proposed project will generate a total of 33,446 average daily trips per day at buildout. Although the lead agency does not provide a breakdown of the vehicles by vehicle type, the proposed 613,304-sq. ft. project which would include retail outlets for "two nationally known retail anchor tenants, a cinema, … retail establishments and miscellaneous commercial uses", (see page 2-3 of the DEIR), is most likely to include a sizeable number of trucks. The lead agency does not quantify potential truck trips nor does it provide any information on the number of trips by heavy-duty diesel trucks that would transport materials and supplies to the proposed major anchor tenants and the other retail outlets. The lead agency does not provide any data on these truck emissions.

Given that the California Air Resources Board (CARB) has designated diesel particulate as a carcinogen, the lead agency needs to demonstrate that the diesel emissions from these trucks will not pose a health (cancer) risk to the residential community located to the north of the proposed project site. SCAQMD staff therefore recommends that the lead agency perform

an air toxics health risk analysis of the diesel truck emissions for the proposed project. The SCAQMD has developed a methodology for estimating cancer risks from mobile sources entitled *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions* which can be accessed at the SCAQMD website: www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. The fueling station also generates fugitive gasoline dispensing emissions. The health risk from the fueling station is in addition to the incremental health risk from diesel delivery trucks and should also be addressed.

4. Significant Operational Emissions

The emissions presented in Table 4.3-8 show that VOC, NO_X, CO and PM10 and PM2.5 all exceed the SCAQMD significance thresholds and therefore the proposed project has significant operational air quality impacts. SCAQMD staff therefore recommends that the lead agency remove the discussion on pages 4.3-17 and 4.15-12 that discount these impacts as being less than significant.

5. Mitigating The Proposed Project's Operational Emissions:

Given that the proposed project's long-term emissions are significant, SCAQMD staff recommends that the lead agency consider the following additional mitigation measures wherever feasible:

- Require the use or newer, lower-emitting trucks for the delivery of materials and supplies to the facility.
- Require trucks to be offloaded promptly to prevent trucks idling for longer than five minutes in compliance with state law.
- Use light-colored roofing materials to deflect heat and conserve energy.
- Install solar panels on roofs to supply electricity for air conditioning.
- Install central water heating systems to reduce energy consumption.
- Install high energy-efficient appliances, such as water heaters, refrigerators, furnaces and boiler units.
- Use double-paned windows to reduce thermal heat.
- Install automatic lighting on/off controls and energy-efficient lighting.
- Provide electrical hook-ups for trucks that need to cool their load.
- Electrify auxiliary power units.
- Electrify service equipment at facility.
- Require retail tenants to provide flyers and pamphlets for truck drivers educating them on the health effects of diesel particulate and the importance of being a good neighbor.

Additionally, SCAQMD staff recommends that the lead agency directly incorporates the policies and programs outlined in the Yucaipa General Plan's air quality element on pages 4.3-19 through 4.3-21 of the DEIR that encourage employee ridesharing and transit use. These should be listed in the Final EIR as part of the mitigation measures for the proposed project.